IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

UNITED STATES OF AMERICA, et al.,	§	
	§	
Plaintiffs,	§	
v.	§	Civil Action No. 1:23-cv-00108-LMB-JFA
	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

**DECLARATION OF ALI NASIRI AMINI
IN SUPPORT OF DEFENDANT GOOGLE LLC'S REVISED OBJECTIONS TO
THE PUBLIC DISCLOSURE OF CONFIDENTIAL INFORMATION AT TRIAL**

I, Ali Nasiri Amini, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1.   I am a Vice President of Engineering and Data Science at Google LLC. I have been employed by Google since July 2009. I submit this declaration in support of Google's Revised Objections to the Public Disclosure of Confidential Information at Trial pursuant to the Court's August 9, 2024 Order.

2.   Based on my work at Google, I have personal knowledge of the company's practices and procedures for maintaining the confidentiality of its source code and other technical product information. The contents of this Declaration are true and correct to the best of my knowledge, information, and belief, and are based on Google's policies and practices as they relate to the treatment of confidential information, the materials that were provided to me and reviewed by me, and are informed by conversations with other knowledgeable employees of Google. If called upon as a witness in this action, I could and would testify competently thereto.

3.   Google follows a strict practice that requires confidential treatment of its source code, product design information, and data. In my experience and to the best of my knowledge, in order to

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protect itself from competitive harm, Google takes significant precautions to ensure that this information is not made public, and does not disclose documents or information of this nature outside of the company, with the exception of certain documents that Google shares with partners or fiduciaries, subject to further confidentiality requirements.

4.   I have reviewed the trial exhibits listed below, and I believe that the sealing (or redaction, when specified) of those exhibits is necessary to protect Google's trade secrets and proprietary information.

5.   I have reviewed DTX2149, DTX2150, DTX2151, DTX2165, DTX2166, DTX2167, DTX2170, DTX2181, DTX2182, DTX2184, DTX2187, and DTX2188. These reflect datasets Google produced during this litigation concerning revenue, fees, and impressions flowing through or concerning Google's products, including with regard to specific advertisers, publishers, or ad tech companies. Disclosing such granular data publically would provide Google's competitors detailed customer data, which could harm Google's customers as well as its competitive position in the marketplace. For this reason, Google strictly maintains the confidentiality of these datasets.

6.   I have reviewed PTX1850, DTX2193, DTX2194, DTX2195, DTX2196, DTX2197, DTX2198, DTX2199, DTX2200, DTX2201, DTX2202, DTX2203, DTX2204, DTX2205, DTX2206, DTX2207, DTX2208, DTX2209, DTX2210, DTX2211, DTX2212, DTX2213, DTX2214, DTX2215, DTX2216, DTX2217, DTX2218, DTX2219, DTX2253, DTX2254, DTX2255, and DTX2256. These exhibits contain Google proprietary source code. Public disclosure would allow competitors to recreate certain Google products, and could harm Google's competitive position in the marketplace. For this reason, Google strictly maintains this competitively sensitive information as confidential and a trade secret.

7.   I have reviewed DTX0451 along with Google's proposed redactions. Google's proposed redactions encompass Google proprietary source code. Public disclosure would allow competitors to recreate Google products, and could harm Google's competitive position in the marketplace. For this
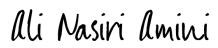
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reason, Google strictly maintains this competitively sensitive information as confidential and a trade secret.

8.   I have reviewed PTX0746 (a duplicate of which is marked as DTX0414), PTX0783 (a duplicate version of which is marked as DTX0605), DTX413, DTX0602, DTX0618, DTX0681, DTX0777, DTX0778, DTX0781, DTX0785, DTX0822, DTX0840, DTX0877, DTX0932, DTX0984, DTX1014, DTX1052, DTX1054, DTX1110, DTX1145, DTX1146, DTX1338, and DTX1382, along with Google's proposed redactions. Google's proposed redactions reflect detailed implementation details for current proprietary product optimizations and features as well as design information for Google's internal engineering and financial systems. Disclosure of such implementations would allow competitors to recreate Google's internal product features and could harm Google's competitive position in the marketplace. For this reason, Google strictly maintains the confidentiality of this competitively sensitive information.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 23, 2024 in   1029 Hermosa Way, Menlo Park,
                                   CA, 94025

Signed by:

Ali Nasiri Amini

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Ali Nasiri Amini